

DAS/EW:AAS  
F.#2009R01513

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.

★ SEP 16 2011 ★

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BROOKLYN OFFICE

UNITED STATES OF AMERICA

- against -

STEVEN SHOW,

I N F O R M A T I O N

**CR 11 644**  
Cr. No. 11-644  
(T. 18, U.S.C., §§ 1343, 2  
and 3551 et seq.)

Defendant.

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**MATSUMOTO, J.**

THE UNITED STATES ATTORNEY CHARGES:

**WATER, M.J.**

INTRODUCTION

At all times relevant to this Information, unless  
otherwise indicated:

1. BMW Financial Services NA, LLC ("BMW Financial Services") was a subsidiary of BMW of North America, LLC, with headquarters in Hilliard, Ohio, that provided financing for BMW vehicles leased or purchased from automobile dealerships in the United States.

2. BMW of Oyster Bay was an automobile dealership based in Oyster Bay, New York that, among other business activities, arranged for customers to purchase or lease new BMW vehicles through BMW Financial Services.

3. On or about August 6, 2010, the defendant STEVEN SHOW applied to lease a BMW vehicle through BMW of Oyster Bay.

As part of the application process, SHOW prepared and submitted a credit application to BMW Financial Services that contained false representations designed to make SHOW appear to be more creditworthy, including false information about SHOW's identity, income and employment. As a result of these false representations, BMW Financial Services approved SHOW's lease application, enabling SHOW to lease a new BMW vehicle.

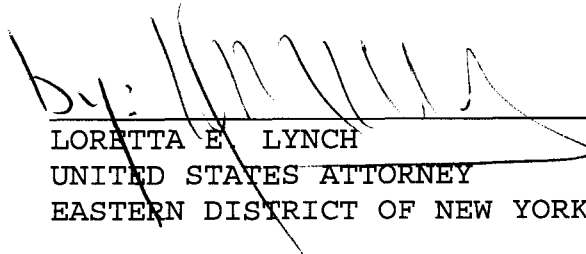
WIRE FRAUD

4. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

5. On or about August 6, 2010, within the Eastern District of New York and elsewhere, the defendant STEVEN SHOW, together with others, did knowingly and intentionally devise a scheme and artifice to defraud BMW of Oyster Bay and BMW Financial Services, and to obtain money and property from BMW of Oyster Bay and BMW Financial Services by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, writings, signs, signals,

pictures and sounds, to wit: the transmission by email of SHOW's credit application from BMW of Oyster Bay in Oyster Bay, New York to BMW Financial Services in Hilliard, Ohio.

(Title 18, United States Code, Sections 1343, 2 and 3551  
et seq.)



LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK